

Gray, Valerie A. (DNREC)

From: Joseph Meyer <possumpointer@hotmail.com>
Sent: Thursday, July 12, 2018 6:40 AM
To: Gray, Valerie A. (DNREC)
Cc: Joseph Meyer; sternberg.david@epa.gov; cristina.fernandez@epa.gov; david.mcguigan@epa.gov
Subject: Delaware's Clean Air Act petitions to reduce air pollution originating elsewhere from coming into the state

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I am submitting my comments for the record in response to the EPA refusing Delaware's request to consider the problems with other states transmitting air pollution to Delaware. Your email on 7/10/18 you gave the opportunity for the public to comment on this subject.

Since I am not able to attend the meeting I want this email to go on record of my opinion on this subject.

The State of Delaware is causing its own air pollution problems and wants to blame other states for problems it causes itself. The Air quality in Sussex County and especially in Millsboro is horrendous. The odor we have to put up with from the poultry industry is one of the main causes of air pollution in the state. The State of Delaware refuses to accept responsibility for this or do anything about it. With all of the new CAFO's (Concentrated Animal Feeding Operations) being built all over the state no wonder we have air and ozone problems. If you ever noticed the large fans in these CAFO's are all pointing outward blowing all of the odors from the production of hundreds of thousands of chickens into the air. Also the odor coming from the poultry processing plants like Mountaire, Allen/Harim and Perdue affects the air quality in a big way. I am sure that the manure, ammonia, hydrogen sulfide and other things has a major affect on the air we breathe.

The odor that comes across the river from the Mountaire Poultry Processing is a pungent, nose, eye, throat burning smell that makes you want to vomit. After numerous reports to Delaware's Department of Air Quality nothing is addressed by them to even try to control the problems.

So in my opinion and many others Delaware is causing it own air quality problems and should clean up its problems before blaming the surrounding states.

I have sent numerous letters to the Delaware Division of Air Quality only to be ignored by them. Below I will give you examples:

This letter was sent to the Director of Air Quality who is pushing for this proposal a Mr. Fees on 7/6/18, I never received a response from him or anyone in that office.

Below is the State of Delaware's regulations on odors, are you familiar with it? Have you ever read it? If not please read it!!!!

**TITLE 7 NATURAL RESOURCES & ENVIRONMENTAL CONTROL
DELAWARE ADMINISTRATIVE CODE 1**

1100 Air Quality Management Section
1119 Control of Odorous Air Contaminants

02/01/1981

1.0 General Provisions

1.1 The purpose of this regulation is to control odorous air contaminants which significantly effect the citizens of the State outside the boundaries of the air contaminant source.

1.2 Methods for determining a condition of air pollution due to an odorous air contaminant may include, but are not limited to, scentometer tests, air quality monitoring, and affidavits from affected citizens and investigators.

02/01/1981

2.0 Requirements

No person shall cause or allow the emission of an odorous air contaminant such as to cause a condition of air pollution.

Mr. Fees, in your EPA Testimony on June 22, 2018 you stated

Over 90% of Delaware's unhealthy levels of ozone originate beyond Delaware's borders.

I think that the unhealthy levels are within the borders of the State.

Since May 1st I have called 13 times to report a noxious odor coming from the Mountaire Poultry Plant in Millsboro. I have sent numerous emails to your offices. It burns your eyes, nose, throat it is the worst smell I have ever, ever smelled!!! It can wake you up at night from a dead sleep, where you have to get up and shut your windows, your eyes tear constantly, you are always tired. What do you think it could be??

This is one of the responses I received via email " Based on the assumption the odors are from the wastewater treatment plant and spray irrigation system, there should be no adverse health implications. Although there may be a strong odor, the compounds are generally found in small concentrations.

That is a Bull Shit Answer!!!

No adverse health implications, Are you kidding me!!!!

Have you ever heard of Hydrogen Sulfide? Have you ever smelled Hydrogen Sulfide? Well Hydrogen Sulfide smells like rotten eggs/sewer gas. That is the smell we get here. As far as the health affects of breathing Hydrogen Sulfide: Studies in humans suggest that the respiratory tract and nervous system are the most sensitive targets of hydrogen sulfide toxicity. Exposure to low concentrations of hydrogen sulfide may cause irritation to the eyes, nose and throat. It may also cause difficulty in breathing. Respiratory distress or arrest has been observed in people exposed to high concentrations of hydrogen sulfide. Exposure to low concentrations of hydrogen sulfide may cause headaches, poor memory, tiredness and balance problems. However in some individuals there may be permanent or long term effects such as headaches, poor attention span, poor memory and poor motor function. (Ref. US Center for Disease Control)

Where does it come from:

Once animals raised on industrial farms are ready for harvest, they enter a butchering or slaughtering operation. From there, the meat is harvested from the animals and goes to a meat-packing operation.

However, that which does not become meat — the byproduct of the operation that includes animal parts, feathers, bones, blood and other biomass — is salvaged and used to produce other products, such as animal feed, antibiotics, insulin, fertilizer, alternative fuels and pet food. Nearly 96 percent of an animal is processed into some marketable product. This operation of using the byproducts from slaughter is called the rendering operation. Manure and urine is funneled from animal areas to pits or lagoons where it is contained, however, gases such as methane and hydrogen sulfide are produced at such pits.

So now we know about the smell, where it comes from and how it affects your health. And we know that the State of Delaware and Department of Natural Resources(dnrec) has rules and regulations to follow.

When we get the smell, I call Dnrec, they in turn call a officer, he calls me back and asks about the smell, I explain to him about the smell, he thanks me and that's it. I have nor have my neighbors ever seen someone come out and investigate the smell. In fact I asked one of your officers if he had ever smelled he odor and what it smelled like, he told me that he is not allowed to answer that question and if I wanted to know I would have to do a FOIA request. I did a FOIA request and never received that information on whether they have ever smelled the odor or what they think it smells like. The agents that I speak to inform me that they report our complaints to the Division of Air Quality, what happens after they report it is out of their control.

Have you ever read any of the information in the news about the lawsuits against Mountaire?? The information is based on hydrologists and experts in their knowledge of wastewater, pollution pertaining to the poultry industry. This is just a excerpt:

"Mountaire's wastewater treatment plant and its spray irrigation and sludge disposal operations also emit dangerous air pollutants, including malodorous hydrogen sulfide and ammonia that reach Plaintiff's residences at levels causing Plaintiff-Intervenors to suffer health effects. Plaintiff-Intervenors and other area residents received no warning or notice of the risks to themselves and their properties. Plaintiff-Intervenors have suffered health effects, live in fear of future health effects."

If professional experts in the poultry arena realize the health problems from breathing this crap, how come the Delaware Division of Air Quality and the Department of Natural Resources cannot see the adverse health problems?

So in closing can you answer me as to why no one has even bothered to investigate the smell or why no one is enforcing the rules and regulations? Why is there no response from the Division of Air Quality? Who do we have to contact to stop these odors??

Why do we have to continually breath something that is detrimental to our health?? If the State of Delaware had any type of concern for these problems and the health of its citizens, you would be setting up meetings with the citizens to discuss what is going on and why you will not take any steps to stop the problem.

The Dictionary defines Communication as: a process by which information is exchanged between individuals.

"What we have here is a failure to communicate"

Jay Meyer

28024 Possum Point Road

Another Letter:

Ms. French,

It is Saturday morning 8:12 am, I am power washing outside for a up coming class reunion.

That smell is coming across the River, it is burning my eyes, nose, and throat. I will call the agent after typing this.

I guess that your office has deemed that it is ok to breath this stuff and it is not harmful to my health despite of the affects
I am having.

I thought after the email to the Division of Air Quality perhaps I would get some response other than the fact that you visited
the Mountaire site and it is obvious no one has not solved the issue.

I hope that this email goes on record as a formal complaint.

Thank you,

Jay Meyer
28024 Possum Point Road
Millsboro, Delaware

This is a response that I received from your Dnrec concerning complaints about odors from Mountaire:

was at the Mountaire Public hearing last week and heard from several people in attendance that there are concerns about how odor complaints are logged. Following the public hearing, we checked the complaint logs and there were not a lot of complaints concerning odor and the Mountaire Millsboro facility. We are concerned that there were not more complaints based on the discussion at the public hearing.

I did a FOIA request to Dnrec on this and I received the complaint log. It shows the following:

- Calls on Complaints started in 1986
- 60 calls since 1986
- 2015 3 calls
- 2017 2 calls
- 2018 23 calls since June
- 8 calls in the past 2 weeks

And not one response from the Division of Air Quality or Mr. Fees. So, this really shows that Delaware wants to blame its problems on someone else and not accept responsibility for its own actions.

In closing I agree with the EPA decision to deny the Delaware's Clean Air Act petitions to reduce air pollution originating elsewhere from coming into the state.

The problem is that Delaware is creating its own air pollution!

Thank you,

Jay Meyer

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